

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

IN RE: ASBESTOS LITIGATION:)
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)
LILLIAN HARWOOD and JAMES HARWOOD,)
her husband)
)
)
 Plaintiffs) C.A. No. 1-06-CV-673
)
)
-vs.-)
)
BONDEX INTERNATIONAL INC., et al.)

**DEFENDANT NORTHROP GRUMMAN CORPORATION' S MOTION
FOR STAY OF PROCEEDINGS AND FOR EXTENSION OF TIME
TO ANSWER OR OTHERWISE PLEAD**

Defendant Northrop Grumman Corporation (“NGC”), through its attorneys, respectfully moves this Honorable Court: (1) to stay all proceedings in this case pending a ruling by the Judicial Panel on Multidistrict Litigation on transfer of the above-captioned matter to the Eastern District of Pennsylvania as part of the *In re Asbestos Products Liability Litigation*, Docket No. MDL-875 (“MDL-875”); and (2) for an extension of time to answer or otherwise plead. NGC has concurrently asked the Judicial Panel on Multidistrict Litigation to transfer the action herein to the Eastern District of Pennsylvania as part of MDL-875. As set forth more fully in the accompanying supporting Memorandum, transfer of this matter to MDL-875 is likely because this matter concerns allegations of asbestos-related disease or injury stemming from exposure to asbestos products and inhalation of the products’ asbestos fibers and because it shares many other common procedural and substantive issues with the actions pending in MDL-875.

Accordingly, principles of expediency, efficiency, comity and avoidance of the waste of this Court’s time, energy, and resources, dictate that all proceedings before this Court in this

matter should be stayed pending transfer to MDL-875. Similarly, and pursuant to Federal Rule of Civil Procedure 6(b), NGC respectfully moves this Court for an order extending the time NGC has to answer or otherwise plead so that pretrial motions and answers related to the Complaint can be filed with and according to the established procedures of MDL-875.

WHEREFORE, for the reasons stated above and more fully set forth in the accompanying Memorandum, Defendant Northrop Grumman Corporation respectfully moves this Court for an order:

- (1) Staying all proceedings in this case pending a decision on transfer to MDL-875 from the MDL Panel; and
- (2) Granting Northrop Grumman Corp. an extension of time to answer or otherwise plead through and including seven (7) days after this case is transferred to MDL-875.

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